

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PATRICK R. TREANOR, LORRAINE	:	C.A. NO. 05-CV-11538-NMG
KELLEY TREANOR, INDIVIDUALLY, AND	:	
AS PARENT AND NEXT FRIEND OF	:	
MADELYN TREANOR, AND AS PARENT	:	
AND NEXT FRIEND OF ALLISON TREANOR:	:	
	:	
v.	:	
	:	
NATIONAL RAILROAD PASSENGER	:	
CORPORATION (a/k/a "AMTRAK") AND	:	
CSX TRANSPORTATION, INC.	:	

JOINT STATEMENT

Pursuant to Fed. R. Civ. P. 26.1 and Local Rule 16.1(d), the undersigned counsel hereby submit the within Joint Statement.

JOINT DISCOVERY PLAN

The following discovery plan is proposed jointly by the parties:

- (i) Documents identified or described in accordance with Fed. R. Civ. P. 26(a) (1) (b), produced or made available by November 11, 2005;
- (ii) Written discovery requests, such as interrogatories and document requests served by December 1, 2005;
- (iii) Depositions of the parties or witnesses completed by May 15, 2006;
- (iv) Designation of experts and disclosure of expert reports by July 1, 2006;
- (v) Depositions of experts (if needed), by August 1, 2006.

MOTION SCHEDULE

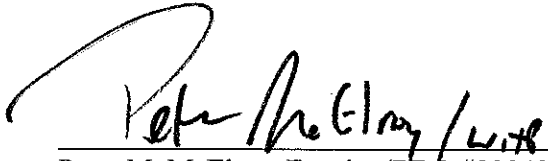
The following motion schedule is proposed:

- (i) Motions to amend the pleadings filed by February 1, 2006.
- (ii) Motions for summary judgment filed by September 15, 2006.

OTHER MATTERS TO BE DISCUSSED AT CONFERENCE

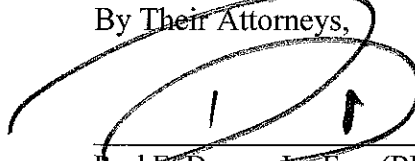
1. The parties have not agreed to have the case tried by Magistrate Judge.

PATRICK R. TREANOR, et al.
By Their Attorney,



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NATIONAL RAILROAD PASSENGER
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By Their Attorneys,



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